



2006 NOV -6 P 1: 24

# ARIZONA REPUBLICAN PARTY

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**Matt Salmon** Chairman

November 3, 2006

Federal Election Commission 999 E Street, NW Washington, D.C. 20463 MUR# 5878

FEDERAL ELECTICH
CONVISSION
OFFICE OF GENERAL
COUNSEL

RE: Complaint against Jim Pederson, Pederson 2006 and the Arizona Democrat Party

To Whom It May Concern:

Pursuant to 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4, the Arizona Republican Party files this Complaint against the following Respondents: Jim Pederson, Democrat candidate for the United States Senste from Arizona, Pederson 2006, the principal authorized campaign committee of Jim Pederson and the Arizona Democrat Party (collectively hereafter "Respondents").

Complainant herein is the Arizona Republican Party.

This complaint is filed against Respondents for their individual and collective acts constituting knowing and willful violations of the Federal Election Campaign Act of 1971, as amended ("the Act" or "FECA") and the regulations of the Federal Election Commission ("the Commission" or "FEC"), specifically for:

- (1) Knowingly and willfully engaging in a deliberate scheme to circumvent and otherwise violate the contribution limits established under the Bipartisan Campaign Reform Act (a/k/a "McCain-Feingold") for support of federal candidates and party committees;
- (2) Knowingly and willfully accepting and disbursing funds in excess of the federal limits established under McCain-Feingold and other provisions of federal law; and

## **Facts and Applicable Law**

L Pederson And The Arizona Domocrat Party Have Engaged In Acts Constituting A Knowing And Willful Schouse To Circumvent The Contribution Limits Established Under Federal Law For Support Of A Federal Candidate And/Or Political Party.

Respondents have engaged over a period of many months in a pattern of deliberate activities designed to circumvent and otherwise violate the campaign contribution limits established under federal law by Pederson's contributions of soft money to the Arizona Democrat Party which were then transferred to other states' Democrat parties in exchange for funds transferred back to the Arizona Democrat Party's federal account, in a 'money-laundering' scheme. As a federal candidate, Pederson himself would be the ultimate beneficiary of these federal funds.

The facts are as follows:

a. Since January 1, 2005, through October 18, 2006, Pederson has contributed more than \$1.1 million to the Arizona Democrat Party's non-federal account, constituting 28% of the Arizona Democrat Party's non-federal total individual receipts (\$4,088,774).

Source(s): Arizona Secretary Of State Website, <u>www.szsos.gov</u>, Accessed September 16, 2006

Pederson Contributions To Arizona Democrat Party Non-Federal Account, January 1, 2005 To October 18, 2006:

Date_	Amount
1/11/2005	\$ 15,000.00
1/27/2005	\$ 116,040.98
2/15/2005	\$ 19,000.00
2/28/2005	\$ 80,000.00
3/14/2005	\$ 26,000.00
4/12/2005	\$ 47,725.36
4/27/2005	\$ 29,000.00
5/12/2005	\$ 20,000.00
5/30/2005	\$ 22,000.00
6/10/2005	\$ 157,000.00
9/15/2005	\$ 25,000.00
10/6/2005	\$ 8,500.00
11/3/2005	\$ 8,500.00
12/13/2005	\$ 8,500.00
12/30/2005	\$ 18,000.00
1/12/2006	\$ 8,500.00
2/2/2006	\$ 8,500.00
3/6/2006	\$ 8,500.00
4/5/2006	\$ 8,500.00
5/8/2006	\$ 8,500.00

6/9/2006	\$ 8,500.00
7/10/2006	\$ 8,500.00
7/28/2006	\$ 375,000.00
8/8/2006	\$ 8,500.00
9/14/2006	\$ 8,500.00
10/4/2006	\$ 94,000.00
Total	\$ 1,145,766.34

Source(s): Arizona Secretary Of State Website, <u>www.azsos.gov</u>, Accessed November 3, 2006

b. On September 14, 2005, Pederson announced his candidacy for the United States Senate. Pederson had filed his Statement of Candidacy and Statement of Organization on September 2, 2005.

Source(s): Jim Pederson, Press Release, "Jim Pederson Announces His Candidacy For U.S. Senste," September 14, 2005; Federal Election Commission Website, <a href="www.fec.gov">www.fec.gov</a>. Accessed September 26, 2006

c. From January 1, 2005 to January 25, 2006, Pederson contributed \$608,766 to the Arizona Democrat Party state (non-federal) account.

Source(s): Arizona Secretary Of State Website, <u>www.azaos.gov</u>, Accessed September 16, 2006

d. On January 25, 2006, the Arizona Democrat Party transferred \$115,000 to the non-federal account of the South Dakota Democrat Party.

Source(s): Arizona Secretary Of State Website, <u>www.azzos.gov</u>, Accessed September 16, 2006

e. The South Dekota Democrat Party, in turn, transferred to the Arizona Democrat Party's federal account the following, peculiar amounts:

February 6, 2006 \$ 18,481
February 6, 2006 \$ 81,519
Total: \$100,000

Source(s): Federal Election Commission Website, <u>www.fec.gov</u>, Accessed September 26, 2006

f. From January 1, 2005 to March 30, 2006, Pederson contributed \$625,766 to the Arizona Democrat Party non-federal account.

Source(s): Arizona Secretary Of State Website, <u>www.azsos.gov</u>, Accessed September 16, 2006

- g. On March 30, 2006, the Arizona Democrat Party transferred \$110,000 in non-federal funds to the Indiana Democrat Party.
- Source(s): Arizona Secretary Of State Website, <u>www.azaos.gov</u>, Accessed September 16, 2006
- h. On the same day (March 30, 2006), the Indiana Democrat Party transferred \$100,000 in federal funds to the Arizona Democrat Party.
- Source(s): Federal Election Commission Website, <u>www.fec.gov</u>, Accessed September 26, 2006
- i. From January 1, 2005 to October 18, 2006, Pederson contributed \$1,145,766 to the Arizona Democrat Party non-federal account.
- Source(s): Arizona Secretary Of State Website, <u>www.azsos.gov</u>, Accessed November 3, 2006
- j. On October 4, 2006, Pederson contributed \$94,000 to the Arizona Democrat Party's non-federal account, according to records on file with the Arizona Secretary of State.
- Source(s): Arizona Secretary Of State Website, <u>www.azaos.gov</u>, Accessed November 3, 2006
- k. The same \$94,000 that Pederson contributed to the Arizona Democrat Party's non-federal account on October 4, 2006 is the same \$94,000 contribution detailed in a campaign finance report filed by the "Arizona Democratic Party-North Carolina Account" with the North Carolina State Board of Elections.
  - ✓ The "Arizona Democratic Party-North Carolina Account" filed its Statement of
    Organization with the North Carolina State Board Of Elections and was received on
    October 4, 2006.

Source(s): Arizona Secretary Of State Website, <u>www.azsos.gov</u>, Accessed November 3, 2006; North Carolina State Board Of Elections Website, <u>www.sboe.state.nc.us</u>, Accessed November 3, 2006

- On October 6, 2006, the Arizona Democrat Party's non-federal account conducted two transfers totaling \$258,200 to the North Carolina Democrat Party's non-federal account. One transfer was conducted for \$225,000 and the other for \$33,200.
- Source(s): Arizona Secretary Of State Website, <u>www.azsos.gov</u>, Accessed November 3, 2006

m. According to records on file with the North Carolina State Board of Elections, the "Arizona Democratic Party-North Carolina Account" made a "contribution" of \$258,200 to the North Carolina Democrat Party's non-federal account on October 5, 2006.

Source(s): North Carolina State Board Of Elections Website, <u>www.shoe.state.nc.us</u>, Accessed November 3, 2006

n. On October 9, 2006, the Arizona Democrat Party's federal account received \$225,000 from the North Carolina Democrat Party's federal account.

Source(s): Federal Election Commission Website, <u>www.fec.gov</u>, Accessed September 26, 2006

- o. In total, the Arizona Democrat Party has transferred at least \$483,200 in non-federal funds in return for \$425,000 in more valuable federal funds which are being used for Federal Election Activities to support the candidacy of Jim Pederson and Pederson 2006.
- p. Recently, when the Arizona Democrat Party was questioned about the non-federal for federal money swaps, Arizona Democrat Party official Michael Fries denied that the Party was engaged in "money laundering," but acknowledged that the swaps "helps federal candidates, including Pederson."
  - "The Arizona Democratic Party sent \$258,200 to its counterpart in North Carolina this month and immediately got a check back for the same amount but in a form it could be spent differently. The move provides the state party here with more cash to support its candidates for federal offices. That includes Jim Pederson . . . . By contrast, the money sent to North Carolina was out of donations to the account that goes to financing the party's efforts to elect candidates for state and legislative offices an account to which Pederson has been the largest contributor. But Michael Frias, campaign director for the Arizona operation, told Capitol Media Services the transaction is not laundering money. Frias acknowledged that 'trade' helps federal candidates, including Pederson. And campaign finance reports show that Pederson has so far contributed more than \$1.1 million to the party's fund for state races, including another \$94,000 less than a month ago." (Howard, Flecher, Capitol Media Services, late October/early November 2006)

Source(s): Howard Fischer, Capitol Media Services, late October/early November 2006

Violations of Federal Law: McCain-Feingold banned the use of 'soft money' in federal campaigns. Since 2002, national, state and local political party committees are required by federal law to spend 100% 'federal' (hard) dollars for all activities in connection with a federal election.

McCain-Feingold provides as follows:

"In general...an amount that is expended or disbursed for Federal election activity by a State...committee of a political party...shall be made

from funds subject to the limitations, prohibitions, and reporting requirements of this Act." 2 U.S.C. §441i(b)

### Federal election activity is defined as:

- "(i) voter registration [within] ... 120 days before...the date of the election:
- (ii) voter identification, get-out-the-vote activity, or generic campaign activity conducted in connection with an election in which a candidate for Federal office appears on the ballot (regardless of whether a candidate for State or local office also appears on the ballot);
- (iii) a public communication that refers to a clearly identified candidate for Federal office...and that promotes or supports a candidate for that office, or attacks or opposes a candidate for that office...; or
- (iv) services provided during any month by an employee of a State...committee of a political party who spends more than 25% of that individual's compensated time during that month on activities in connection with a Federal election."

The Arizona Democrat Party is required by law to spend 100% federal dollars for all campaign activities related to the General Election in 2006. The maximum contribution an individual can contribute to the Arizona Democrat Party's federal account is \$10,000 per calendar year and such contributions count toward that donor's aggregate contribution limits over the two-year election cycle. 2 U.S.C. §441a.

Here, Pederson and the Arizona Democrat Party have concocted and implemented a scheme whereby Pederson has contributed over \$1.1 million to the Arizona Democrat Party's nonfederal account, followed by a 'swap' of nearly a half-million dollars in soft money to other state Democrat parties in exchange for \$425,000 in funds for the Arizona Democrat Party's federal account. Those federal funds are now being used to support Pederson's campaign / candidacy for the United States Senate...in violation of federal law.

The plan constitutes a series of knowing and willful violations of McCain-Feingold. 2 U.S.C.  $\S$ 437g(a)(5)(B), (6)(C) and (d)(1).

- II. Pederson's Contributions To The Arizona Democrat Party's State Account Are Non-Federal Dollars Being Used Illegally For Federal Election Activities In Violation Of The McCain-Feingeld Law.
- a. Records on file with the Arizona Secretary of State show Pederson contributing in excess of \$1 million to the Arizona Democrat Party's non-federal account since January 1, 2005.

Source(s): Arizona Secretary Of State Website, <u>www.azaos.gov</u>, Accessed September 16, 2006

b. Both Pederson and the Arizona Democrat Party have acknowledged publicly that Pederson is funding the Arizona Democrat Party in substantial amounts during the current election cycle.

✓ "Pederson gives \$8,500 monthly to the party to cover rent at its headquarters at 2910
N. Central Ave., in Phoenix, said chairman David Wald. The Democratic challenger
wrote a single check for \$375,000 on July 28."

Source(s): Paul Giblin, "Pederson Financing Campaign, Dems, Records Show," East Valley Tribune, September 1, 2006

Non-federal funds contributed to the Arizona Democrat Party's state account may not be used for 'federal election activities'. The Chairman of the Arizona Democrat Party, David Waid, has publicly acknowledged that funds from Pederson are being used for a "vote-by-mail program." See Exhibit A.

Arizona Democrat Party Chairman David Waid: "The money [from Pederson] is being used for programs including candidate training and a vote-by-mail campaign — but not for Pederson."

Source(s): Paul Giblin, "Pederson Financing Campaign, Dems, Records Show," East Valley Tribuse, September 1, 2006

A 'vote-by-mail' program is a federal election activity ("FEA") as defined by the Federal Election Commission ("FEC") and reiterated in the FEC's regulations re-stated earlier this year:

Definition of Federal Election Activity, 71 Fed. Reg. 8927 (Final Rule, February 22, 2006)

SUPPLEMENTARY INFORMATION: The Bipartisan Campaign Reform Act of 2002 ("BCRA"), Public Law No. 107–155, 116 Stat. 81 (2002), amended FECA by adding a new term, "Federal election activity," to describe certain activities that State, district, and local party committees must pay for with either Federal funds or a combination of Federal and Levin funds. (reference omitted) 2 U.S.C. 431(20) and 441i(b)(1). The FEA requirements apply to all State, district, and local party committees..."

A. Definitions of ... "GOTV Activity" (11 CFR 100.24(a)(3))

"BCRA uses the terms "voter registration activity" and "get-out-the-vote activity" within the definition of FEA. Congress did not, however, define those terms. See 2 U.S.C. 431(20)(A)(i)-(ii).3 In 2002, the Commission defined "voter registration activity" ... Similarly, Commission regulations define "GOTV activity" to mean contacting registered voters by telephone, in person, or by other individualized means, to assist them in engaging in the act of voting." 11 CFR 100.24(a)(3). This provision also includes a non-

exhaustive list of examples of different types of GOTV activity. See 11 CFR 100.24(a)(3)(i)-(ii)...

"Also, the definition of "GOTV activity" would apply equally to actions taken with regard to absentee balloting or early voting." 71 Fed. Reg. \$030 (emphasis added)

In its Explanation and Justification of the Interim Final Rule Defining Federal Election Activity (71 Fed. Reg. 14359 (March 22, 2006)), the FEC quoted Sen. McCain in adopting its final rules defining "get-out-the-vote" activity, saying:

"BCRA requires State, district, and local political perty committees and organizations to finance FEA with Federal funds or, in some instances, with an allocated mix of Federal funds and Levin funds. 2 U.S.C. 441i(b). One of the principal sponsors of BCRA described its FEA provisions as "a balanced approach which addresses the very real danger that Federal contribution limits could be evaded by diverting funds to State and local parties," while "not attempt[ing] to regulate State and local party spending where this danger is not present, and where State and local parties engage in purely non-Federal activities." 148 Cong. Rec. S2138 (daily ed. Mar. 20, 2002) (Statement of Sen. McCain).

The law is quite clear: a 'vote-by-mail' program must be paid with 100% federal dollars or, in some instances, a mix of federal dollars and so-called Levin funds. It is illegal for Pederson to finance through contributions to the Arizona Democrat Party's state (soft money) account a 'vote-by-mail' program associated with a primary or general election on which his name appears on a ballot.

The 'vote-by-mail' program paid for by soft, not hard, dollars violates the provisions of McCain-Feingold law which require State parties to pay for federal election activities from hard dollar/federal funds. 2 U.S.C. §441i(b)(1). Pederson's involvement as the source of the funding for the illegal soft dollar expenditures constitute a knowing and willful violation of 2 U.S.C. §441i(b)(2)(C), prohibiting federal candidates from acting jointly with state parties to solicit, receive, or direct through fundraising activities contributions not subject to the limitations of federal law.

## Conclusion

Upon information and belief, and based upon the facts presented above, Jim Pederson, Pederson 2006 and the Arizona Democrat Party have knowingly and willfully violated the Federal Election Campaign Act of 1971, as amended, and, in particular, the provisions cited above.

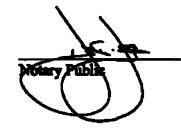
Submitted,

Glenn Hamer, Executive Director Arizona Republican Party

Before me this 3<sup>-1</sup> day of November, 2006, appeared Glenn Hamer and under penalty of perjury does hereby swear and affirm that the above and foregoing facts are true and correct to the best of his knowledge and belief.



My Commission Expires: Jan. 25 Zooq



#### EXHIBIT A:

## Pederson Financing Campaign, Dems, Records Show: Candidate's \$1M In Contributions To Party Began In '04

East Valley Tribune (Mesa, Arizona)

September 1, 2006 Friday

Distributed by McClatchy-Tribune Business News

By Paul Giblin

Sep. 1—While U.S. Senate candidate Jim Pederson was financing his own campaign to the tune of \$8.3 million, he also was giving more than \$1 million to the Arizona Democratic Party, according to campaign finance records released Thursday.

Pederson's \$1 million in contributions to the state Democratic party span nearly two years since the 2004 elections, according to the Arizona Secretary of State's Office. Pederson, a past chairman of the party, donated millions of dollars during his tenure and actually has eased back since stepping down to run against Republican incumbent Sen. Jon Kyl.

Pederson gives \$8,500 monthly to the party to cover rent at its headquarters at 2910 N. Central Ave., in Phoenix, said chairman David Waid. The Democratic challenger wrote a single check for \$375,000 on July 28.

Waid said the money is being used for programs including candidate training and a vote-by-mail campaign — but not for Pederson.

"The one thing we are precluded from doing is spending any of that money on Jim. We absolutely cannot spend a dime of it on him," Waid said.

#### In other developments:

- —Kyl still holds an edge against Pederson for overall campaign contributions in their Senate race, according to federal campaign filings.
- —The Federal Election Commission denied Kyl's request to raise the contribution limits for those who donate to his campaign.

Pederson's and Kyl's campaigns publicly released their pre-primary campaign finance reports Thursday.

Pederson's campaign had collected \$8.2 million overall through Aug. 23, including nearly \$5.8 million he has contributed himself. The campaign had nearly \$1.5 million cash on hand at the time.

Pederson has since contributed more to his campaign, bringing his current personal total to \$8.3 million.

Kyl's campaign had collected nearly \$11.3 million and had \$6.7 million cash on hand on Aug. 23. Kyl, a lawyer before election to the Senate, has not donated any money to his re-election campaign.

Also, the Federal Elections Commission denied Kyl's request to raise the limit of \$2,100 that he can collect from each of his contributors during the primary.

Ky I had argued that Pederson's contributions to his own campaign should have triggered the "Millionaire's Amendment" provision, which would have mised Kyl's limits.

The FEC ruled that the \$2,100 ceiling remains in place because the election is still in primary stage and Pederson and Kyi are not formally running against each other yet.

Neither face primary opponents on Sept. 12.

The general election is Nov. 7. If Pederson continues to self-fund at his current rate, he'll trigger the Millionaire's Amendment provision about a week after the primary. The threshold is \$1.2 million.

Earlier this week, an Arizona State University/KAETTV (Channel 8) poll had Kyl ahead 46 to 36.

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The Campaign Finance information published here is from the original reports filed by political committees. In some cases there may be slight differences in cumulative totals due to the ongoing reconciliation between the Secretary of State and those committees. To order copies of original reports, please call (602) 542-8653 or email stactions German, gov.

**SCHEDULE A Individual Contributions** 

**AZ STATE DEMOCRATIC COMMITTEE NON-FEDERAL (0000-01043)** 2006 PRE-GENERAL REPORT 10/03/2006-10/18/2006 FILED ELECTRONICALLY

Records 1 to 2			
Delle	Hamo-Address / Homo	Amount	To Dal Amous
10/03/2008	Fort McDowell Yarepal Mellon 2220 Calab Court Claristate, AZ 86324	\$100,000,000	0.000,1618
10/03/2006	Fort McDonoli Yanepai Mullion 2220 Galub Court Claristain, AZ 98324	\$10,000.00	<b>8146,000.</b> 0
19/03/2006	Greenberg, Edith M. Cocupation: Retired Employer: Retired	910,000,018	\$10,000.0
10/00/2008	Greenberg, Heroid H. Cocupation: Emousive Employee: Rayoo Carperation	810,000.00	810,000.0
16/04/2006	Pederson, James E. Conspellon: Real Estate Developed Chair Employee: The Pederson Group	984,000.80	\$1,145,796.2
10/04/2000	Belt Piver Pime-Maricope Indian Contatually 18006 E Cohem Reed Swetzelele, AZ 86206	\$100,000.00	\$892,500.0
19/08/2008	Gile Filver Indian Community Per Bax 97 Secolon, AZ 88247—609	00.800,01\$	\$272,000.6
10/08/2008	Glig River Indian Community Pe Box 97 Seculos, AZ 85347-000	\$66,000,80\$	\$37,600.6

10/06/2006	Gruenberg, Hereld H. Cocupation: Executive Employer: Royce Corporation	\$100,000.00	\$110,000.00
19/08/2006	Tuhomo O'Odham Hallon Pe Bax 837 Sells, AZ 88894—883	\$10,000.00	\$170,000.00
10/05/2005	Tohono C'Odhon Mallen Po Ban 437 Balla, AZ 88884—688	\$61,571.00	\$290,371.00
10/10/2008	COMMITTEE TO ELECT WES EDMONDS 70 LD1 Po Sur 2016 Chins Valley, AZ 85223	\$100.00	\$100.00
10/10/2008	Gün Fiber Indian Community Po Bax 87 Sepalan, AZ 85367—308	\$10,090.00	\$347,000.00
19/10/2008	Schnertz, Bernard Cocapolism; ChelmmaniCBO Employer: BLS investments, LLC	\$2,900.00	\$2,500.00
19/13/2006	Mains, Alliado J. Cupupalins: Ouner Employer: Moling Joulery	\$10,000.80	\$10,000.00
10/12/2006	Melins, Alfredo J. Cocupallan: Conner Employer: Melins Jawlery	\$8,000,80	\$18,000.00
10/12/2006	Mellins, Llen J. Couspellon: Director Employer: Mellins Joulery	\$10,000.00	\$10,000.00
10/12/2006	Meline, Live J. Cosseption: Director Employer: Meline Justiny	00.000,8\$	\$15,000.00
10/13/2006	Bechtel, Joines G. Copypellen: Fermer Employer: Bell	98,000,88	00.000.08
10/13/2006	Bechtel, Look R. Cocupation: Fedinar Employer: Belf	\$6,000.00	\$5,000.00
Date	Hamo+Address / Home	Amount	To Date Amount
Records 1 to 2	0 of 28		

First Page	Prev Page	Next Page	Last Page	Summary Page
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## **SCHEDULE D6** Transfers to Other Political Committees

AZ STATE DEMOCRATIC COMMITTEE NON-FEDERAL (0000-01043) **2006 PRE-GENERAL REPORT** 10/03/2006-10/18/2006 FILED ELECTRONICALLY

Records 1 to 3	<b>d3</b>		
Debo	Name+Address / Memo	Amount	To Date Amount
19/06/2006	Coconino County Democratic Party 6540 E Wald Pood Pingstoff, AZ 66004 Atlanto Transfer	\$1,000.54	925,000.54
10/08/2006	North Coroline Democratic Party 250 Hillsborough Blood Palaigh, NC 27608 Allialo Transfer	\$225,000.00	\$225,000.00
10/00/2006	North Careline Democratis Party 220 Hillaborough Steet Paleigh, NC 27608 Affinite Transfer	\$31,200.00	\$258,290.00
Date	Nemo+Address / Memo	Amount	To Date Amount
Records 1 to 3	d3		



# **SCHEDULE A**

# ITEMIZED RECEIPTS

Line #: 12

# Committee: ARIZONA STATE DEMOCRATIC CENTRAL EXECUTIVE COMMITTEE

Contributor's Name Contributor's Address  Democratic National Committee 430 South Capitol Street SE Washington, DC 20003  Democratic National Committee 430 South Capitol Street SE Washington, DC 20003  North Carolina Democratic	Employer	Date	Amount (\$)
	Occupation	Memo	Aggregate (3)
	Meme/Description		Limits
Democratic National Committee		10/06/2006	12000.00
	_		443118.56
Washington, DC 20003	Affiliate Transfer		
		10/06/2006	35625.00
			478743.56
Washington, DC 20003	Affiliate Transfer	10/09/2006 225	
North Carolina Democratic		10/09/2006	225000.00
Party 220 Hillsborough Street			225000.00
Raleigh, North Carolina 27603	Affiliate Transfer		
Democratic Congressional Campaign Committee C/O Allie Wade 430 S. Capitol St. SE Washington, DC 20003		10/03/2006	10000.00
			155000.00
	Affiliate Transfer		
Democratic Congressional		10/10/2006	65000.00
Campaign Committee C/O Allie Wade 430 S. Capitol St. SE Washington, DC 20003			220000.00
	Affiliate Transfer		

Tempe, Arizona 85285	Affiliate Committee Transfer		
			93000.00
		10/09/2006	93000.00
P.O. Box 6554 Phoenix, Arizona 85005  ASDC Partnership Program 430 South Capitol St. SE Washington, DC 20003  Harry Mitchell For Congress PO Box 23748 Tomne, Arizona 85285	ASDC Partnership Program transfer	2530518A12-17- 93909-97786	
			1498.02
		10/14/2006	521.84
	Affiliate Committee Transfer		
Paster Fer Arizona 2006 P.O. Roy 6554			4500.00
		10/13/2006	4500.00

Total Donation Amount (Non-Memo)	
Total Memo Amount	
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